

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

LOLITA RIDGEWAY and TORRIS RIDGEWAY SR.,
individuals,

DEFENDANTS

MIR E. ALI and SHAKER ALI, individually and doing
business as HASTINGS STREET APARTMENTS,

(b) County of Residence of First Listed Plaintiff Alameda

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Alameda

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Law Offices of Stuart E. Fagan
P.O. Box 503741

San Diego, California 92150-3741
(858) 220-9601

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question
(U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 410 Antitrust	
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 430 Banks and Banking	
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 450 Commerce	
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 460 Deportation	
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 480 Consumer Credit	
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 490 Cable/Sat TV	
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 610 Selective Service	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 850 Securities/Commodities/ Exchange	
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 890 Other Statutory Actions	
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<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motion to Vacate Sentence	<input type="checkbox"/> 892 Economic Stabilization Act	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 515 Habeas Corpus:	<input type="checkbox"/> 893 Environmental Matters	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input checked="" type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 894 Energy Allocation Act	
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 895 Freedom of Information Act	
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 950 Constitutionality of State Statutes	
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 555 Prison Condition		
V. ORIGIN	(Place an "X" in One Box Only)			
<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify) _____
				<input type="checkbox"/> 6 Multidistrict Litigation
				<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment
VI. CAUSE OF ACTION	Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. Sec. 3601			

Brief description of cause: Unlawful discrimination in the operation of the Hastings Street Apartments.

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION DEMAND \$ Proof
UNDER F.R.C.P. 23

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE

DOCKET NUMBER _____

DATE

February 13, 2008

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

NDC-JS44

1 **LAW OFFICES OF STUART E. FAGAN**
 2 STUART E. FAGAN, State Bar No. 152732
 3 P.O. Box 503741
 4 San Diego, California 92150-3741
 5 Telephone: (858) 220-9601
 6 Facsimile: (858) 676-5339
 7 Email: fairhousinglawyer@sbcglobal.net

8 Attorneys for Plaintiffs

9
 10 **FILED**
 11 FEB 19 2008
 12 RICHARD W. WIEKING
 13 CLERK, U.S. DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 OAKLAND
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29 **ORIGINAL**

30 UNITED STATES DISTRICT COURT

31 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

32 No.

33 **C08-01001 EDL**

34 COMPLAINT FOR MONETARY,
 35 DECLARATORY, AND INJUNCTIVE
 36 RELIEF; DEMAND FOR TRIAL BY
 37 JURY

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I.

INTRODUCTION

1. This action seeks monetary, declaratory, and injunctive relief against defendants for discriminating against families with children in the operation of the Hastings Street Apartments based on familial status and for coercing, intimidating, threatening, retaliating, or interfering with plaintiffs in the exercise or enjoyment of, or on account of their having exercised or enjoyed, or on account of their having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by the Fair Housing Act and/or the Fair Employment and Housing Act in violation of the Fair Housing Act of 1968, as amended, 42 U.S.C. §§3601 *et seq.*, and related federal and state laws.

II.

JURISDICTION AND VENUE

2. Jurisdiction is conferred upon this Court pursuant to 28 U.S.C. §1331 in that the claims alleged herein arise under the laws of the United States. This Court has supplemental jurisdiction pursuant to 28 U.S.C. §1337 to hear and determine Plaintiffs' state law claims because those claims are related to Plaintiffs' federal law claims and arise out of a common nucleus of related facts. Plaintiffs' state law claims are related to Plaintiffs' federal law claims such that those claims form part of the same case or controversy under Article III of the United States Constitution.

3. Venue is proper in that the claims alleged herein arose within the City of Fremont, Alameda County, California.

III.

INTRADISTRICT ASSIGNMENT

4. This matter should be assigned to the Oakland Division, for the claims alleged herein arose within the City of Fremont, Alameda County, California. Furthermore, all parties reside in Alameda County, California.

IV.

PARTIES

5. Plaintiffs Lolita Ridgeway and Torris Ridgeway Sr., reside in San Leandro, California.

6. Plaintiffs bring this action on behalf of themselves pursuant to the California Unfair Business Practices Act, California Business & Professions Code Sec. 17204.

7. Defendants Mir E. Ali and Shakera Ali were at all relevant times the owners and operators of the Hastings Street Apartments. The Hastings Street Apartments is an apartment complex comprised of approximately 54 units located at 38657 Hastings Street, in the City of Fremont, California (the "Hastings Street Apartments").

8. Defendants Mir E. Ali and Shakera Ali reside in the City of Fremont, Alameda County, California.

9. Defendants Mir E. Ali and Shakera Ali are engaged in the business of renting units at the Hastings Street Apartments to members of the public. Defendants Mir E. Ali and Shakera Ali advertise the Hastings Street Apartments as available for rent by members of the public.

1 10. Each defendant is sued herein individually and as doing business as the Hastings
2 Street Apartments.

3
4 11. Each defendant is, and at all times herein relevant was, the agent, employee, or
5 representative of each other defendant, in doing the acts or in omitting to act as alleged in this
6 compliant, was acting within the course and scope of his or her actual or apparent authority pursuant to
7 such agency; or the alleged acts or omissions of each defendant as agent were subsequently ratified and
8 adopted by each defendant as principal.

9
10 V.

11 **FACTS**

12 12. Defendants Mir E. Ali and Shakera Ali, acting individually and in concert with
13 others, directly and through agents, engaged in a pattern or practice of discrimination against families
14 with children, including Plaintiffs, on account of familial status in the operation of the Hastings Street
15 Apartments.

16 13. In or around 1988, Plaintiffs entered into a lease with the then owners of
17 the Hastings Apartments for 38657 Hastings Street, Apt. #1, Fremont, California. During the entire
18 time that Plaintiffs resided at the Hastings Apartments, they received housing assistance from the
19 Alameda County Housing Authority.

20 14. Since in or around 1997, Plaintiffs regularly entertained, babysat, and at times
21 allowed their grandchildren to live with them for short periods of time at the complex.

22
23 15. On or around July 28, 2005, Defendants acquired ownership of the Hastings
24 Street Apartments. Shortly thereafter, Defendant Mir Ali received a water bill for the Hastings Street

1 Apartments and grew very upset at the tenants. Thereafter, Defendant Mir Ali came to Plaintiffs'
2 apartment and asked Plaintiffs if their grandchildren took baths at their apartment, for Defendant Mir
3 Ali contended that such action was contributing to the high water bill. Plaintiffs assured Defendant
4 Mir Ali that their grandchildren did not currently reside with them, but lived around the corner and
5 merely visited from time to time to help Plaintiffs with certain chores and to visit.

6

7 16. On or about August 15, 2005, Defendant Mir Ali returned to Plaintiffs'
8 apartment and told them that they were having trouble with children running around the complex, so he
9 had changed the House Rules and asked Plaintiffs to sign the new House Rules for the Hastings Street
10 Apartments (the "House Rules"). He left the new House Rules with Plaintiffs and asked them to
11 review, sign, and return them to him. The new House Rules declared, *viz*, "The conduct of small
12 children or any guests is the responsibility of the adult in attendance. No playing or running in the
13 hallway, or in the stairways is permitted, no loud play outdoor that is disturbing to other residents. No
14 roller-blading, skate boarding, bicycle riding are permitted in any common areas such balcony,
15 walkways, parking and driveway areas. This will be strongly enforced for the safety of all tenants. No
16 running or game playing is permitted anywhere on the premises or on the grass." The new House
17 Rules, furthermore, forbid grandparents from babysitting their own grandchildren at the complex.
18 Finally, the new House Rules threatened the issuance of a 30-Day Notice to Terminate Tenancy should
19 the tenants fail to abide by the new House Rules.

20

21 17. After reviewing the new House Rules, Plaintiff Lolita Ridgeway told Defendants
22 that they refused to sign the new House Rules, for, among other things, they forbid Plaintiffs from
23 having their grandchildren stay at their apartment. Defendant Mir Ali then demanded that Plaintiffs
24 return the new House Rules to him, but Plaintiffs refused to comply.

25

26 18. On and after August 15, 2005, Plaintiffs' grandchildren were told on multiple
27 occasions by Defendants that they could not be outside. On one occasion, Defendant Mir Ali told one

1 of Plaintiffs' grandchildren that he could not be outside in the common areas of the complex. The
2 child was simply talking with a friend. What is more, Defendant Mir Ali told the child's friend that he
3 had to "go home," for he could not be at the complex.

4

5 19. On and after August 15, 2005, Defendant Mir Ali repeatedly telephoned
6 Plaintiffs to ask if their grandchildren were over visiting them or if there was any trouble at the
7 complex.

8

9 20. As time passed, Plaintiffs tired of being harassed by Defendants whenever one
10 of Plaintiffs' grandchildren came to their apartment, as such, they discouraged their grandchildren from
11 coming to visit them. In light of Plaintiff Torris Ridgeway Sr.'s disability, Plaintiffs were deprived of
12 visiting with their grandchildren.

13

14 21. Be that as it may, as the months passed, Defendant Mir Ali repeatedly asked
15 Plaintiffs to execute the new House Rules, but they continued to object, for they believed that, in
16 particular, the provision forbidding them from babysitting their grandchildren was unlawful, as such
17 they informed Defendants that they would not execute the new House Rules.

18

19 22. About three months after Defendants acquired the Hastings Street Apartments,
20 Defendant Mir Ali began asking if he could show Plaintiffs' apartment to prospective tenants, for it
21 was the cleanest unit. Defendant Mir Ali, however, never showed Plaintiffs' apartment to any
22 prospective tenants, but did enter Plaintiffs' apartment on several occasions to take pictures of their
23 unit without their permission.

24

25 23. At or around that time, James Lee, the owner of the apartment complex across
26 the street from the Hastings Street Apartments stated that he was "getting rid of all the niggers on the
27 block." Defendant Mir Ali frequently visited with Mr. Lee at Mr. Lee's complex during this time

1 frame. Thereafter, Defendant Mir Ali began asking questions about Plaintiffs' grandson, Kevin, her
2 son, Torris Jr., and everyone who came to visit Plaintiffs. Plaintiffs, as well as their son, grandson, and
3 visitors, are African Americans.

4

5 24. Thereafter, on or about July 25, 2006, Defendants served a written
6 notice on Plaintiffs informing them that their rent was going to be increased by 18%. In the written
7 notice, Defendants stated, "If you do not agree with the term of this proposal, please sign the attached
8 'Tennant's (sic) Notice to Vacate' form and mail it back to me no later then (sic) August 25th of 2006."
9 At the time that Defendant Mir Ali personally delivered the written notice to Plaintiffs he told them
10 that they could either sign the new House Rules and accept the new rental rate or move out.

11

12 25. Because the Plaintiffs were on public assistance after Plaintiff Torris Ridgeway
13 retired, they could not afford to continue residing at the Hastings Street Apartments with the proposed
14 rental increase. What is more, they refused to sign the new House Rules and be voluntarily subjected
15 to discriminatory treatment. As a result, Plaintiffs vacated the premises after providing proper notice.

16

17 VI.

18 INJURIES

19

20 26. By reason of defendants' unlawful acts and practices, plaintiffs have suffered
21 loss of important housing opportunities, violation of their civil rights, deprivation of the full use and
22 enjoyment of their tenancy, wrongful eviction, and severe emotional distress and physical injury,
23 humiliation and mental anguish, including bodily injury such as stomach aches; head aches; sleep loss
24 and sleeping too much; appetite loss, feelings of depression, discouragement, anger, and nervousness;
25 and reliving the experience; and other special and general damages according to proof. Accordingly,
26 plaintiffs are entitled to compensatory damages.

27. In doing the acts of which plaintiffs complain, defendants and their agents and employees intentionally or recklessly violated plaintiffs' civil rights. Accordingly, all plaintiffs are entitled to punitive damages.

28. There now exists an actual controversy between the parties regarding defendants' duties under the federal and state fair housing laws. Accordingly, all plaintiffs are entitled to declaratory relief.

29. Unless enjoined, defendants will continue to engage in the unlawful acts and the pattern or practice of discrimination described above.

VII.

FIRST CLAIM

30. Plaintiffs reallege and incorporate by reference paragraphs 1 through 29 of the complaint herein.

31. Defendants have injured plaintiffs in violation of the federal Fair Housing Act by committing the following discriminatory housing practices:

A. Discriminating in the terms, conditions, and privileges of the rental of a dwelling because of familial status, or in the provision of services or facilities in connection therewith, because of familial status in violation of 42 U.S.C. §3604(b);

B. Making, printing, or publishing notices, statements, or advertisements, with respect to the rental of a dwelling that indicates a preference, limitation, or discrimination based on familial status, or an intention to make any such preference, limitation, or discrimination in violation of 42 U.S.C. §3604(c);

1 C. Coercing, intimidating, threatening, retaliating, or interfering with persons in
 2 their exercise or enjoyment of, or on account of their having exercised or enjoyed, or on account of
 3 their having aided or encouraged any other person in the exercise or enjoyment of, any right granted by
 4 or protected by the Fair Housing Act in violation of 42 U.S.C. §3617.

5

6 **SECOND CLAIM**

7 **(California Fair Employment and Housing Act)**

8

9 32. Plaintiffs reallege and incorporate by reference paragraphs 1 through 31 of the
 10 complaint herein.

11

12 33. Defendants have injured plaintiffs in violation of the California Fair
 13 Employment and Housing Act by committing the following discriminatory housing practices:

14 A. Discriminating in the terms, conditions, and privileges of the rental of a dwelling
 15 because of familial status in violation of California Government Code §§12955(a) and (d);

16 B. Making, printing, or publishing notices, statements, or advertisements, with
 17 respect to the rental of a dwelling that indicates a preference, limitation, or discrimination based on
 18 familial status, or an intention to make any such preference, limitation, or discrimination in violation of
 19 California Government Code §12955(c);

20 C. Expressing a preference for or limitation on a renter because of familial status in
 21 violation of California Government Code §12955(d);

22 D. Harassing, evicting, or otherwise discriminating against any person in the rental
 23 of housing accommodations where the dominant purpose is retaliation against a person who, among
 24 other things, has opposed practices unlawful under the Fair Employment and Housing Act, in violation
 25 of California Government Code §12955(f);

26 E. Aiding, abetting, inciting, compelling, or coercing the doing of any of the acts
 27 declared unlawful in the Fair Employment and Housing Act, in violation of California Government

1 Code §12955(g); and

2 F. Coercing, threatening, intimidating, or interfering with persons in their
3 enjoyment of, or on account of that person having exercised or enjoyed, or on account of that person
4 having aided or encouraged any other person in the exercise or enjoyment of, any right granted or
5 protected by California Government Code §12955 or 12955.1 in violation of California Government
6 Code §12955.7.

7

8 **THIRD CLAIM**

9 **(California Unruh Civil Rights Act)**

10

11 34. Plaintiffs reallege and incorporate by reference paragraphs 1 through 33 of the
12 complaint herein.

13

14 35. Defendants injured the plaintiffs in violation of the Unruh Civil Rights Act,
15 California Civil Code §51 *et seq.* by discriminating against them and families with children in the
16 operation of the Hastings Street Apartments, a business establishment, because of familial status.

17

18 36. Pursuant to the Unruh Civil Rights Act, plaintiffs are entitled to statutory
19 damages, among other remedies, of up to three times their actual damages as determined by the trier of
20 fact, but no less than \$4,000.00 for each violation by each defendants.

21

22 **FOURTH CLAIM**

23 **(Unfair Business Practices)**

24

25 37. Plaintiffs reallege and incorporate by reference paragraphs 1 through 36 of the
26 complaint herein.

38. In acting as herein alleged, defendants have engaged in a pattern or practice of unlawful discrimination in the operation of the Hastings Street Apartments, a business establishment, and therefore have engaged in acts of unfair competition as the same is defined in California Business & Professions Code §17204.

FIFTH CLAIM

(Negligence)

39. Plaintiffs reallege and incorporate by reference paragraphs 1 through 38 of the complaint herein.

40. Defendants owed plaintiffs a duty to operate the Hastings Street Apartments in a manner that was free from unlawful discrimination, and to hire, train, supervise, and discipline their employees and themselves to fulfill that duty. Defendants negligently violated that duty by discriminating against families with children on account of their familial status. Defendants' violation of that duty was the result of negligence, including, but not limited to:

A. Defendants' negligent failure to hire persons who were familiar with the requirements of state and federal fair housing laws;

B. Defendants' negligent failure to train their employees and themselves regarding the requirements of state and federal fair housing laws;

C. Defendants' negligent failure to supervise their employees regarding compliance with the requirements of state and federal fair housing laws; and

D. Defendants' negligent failure to discipline or terminate employees who failed to comply with the requirements of state and federal fair housing laws.

41. As a legal result of defendants' negligent conduct, the plaintiffs have suffered loss of an important housing opportunity, violation of their civil rights, deprivation of the full use and

1 enjoyment of their tenancy, invasion of the private right of occupancy, wrongful eviction, and bodily
 2 injury, including severe humiliation, physical and emotional distress.

3

4 **VIII.**

5 **PRAYER FOR RELIEF**

6

7 WHEREFORE, plaintiffs pray for entry of judgment against defendants that:

8

9 1. Awards compensatory and punitive damages according to proof;
 10 2. Declares that defendants have violated the provisions of the applicable federal and state
 11 fair housing laws;

12 3. Enjoins all unlawful practices complained about herein and imposes affirmative
 13 injunctive relief requiring defendants, their partners, agents, employees, assignees, and all persons
 14 acting in concert or participating with them, to take affirmative action to provide equal housing
 15 opportunities to all tenants and prospective tenants regardless of familial status;

16 4. Awards up to three times the amount of actual damages for each individual plaintiff
 17 against each defendant pursuant to the Unruh Civil Rights Act, but no less than \$4,000.00 for each
 18 violation by each defendant;

19 5. Awards pre-judgment interest and post-judgment interest as provided for by law;
 20 6. Awards costs of suit herein incurred, including reasonable attorneys' fees; and
 21 7. Awards all such other and further relief as the court may deem proper.

22

23 Dated: February 13, 2008

24

LAW OFFICES OF
 STUART E. FAGAN

25 By:

26 
 27 Stuart E. Fagan
 28 Attorneys for Plaintiffs

Complaint

IX.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, plaintiffs hereby request a trial by jury.

Dated: February 13, 2008

LAW OFFICES OF
STUART E. FAGAN

By: J. Stuart E. Fagan
Attorneys for Plaintiffs

Complaint